

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

FILED  
JUN 02 2015  
Clerk

UNITED STATES OF AMERICA,

Case Number 15-40075

Plaintiff,

INDICTMENT

vs.

BENJAMIN LYLE IVERSON,

Attempted Commercial Sex  
Trafficking

Defendant.

18 U.S.C. §§ 1591 and 1594(a)

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The Grand Jury charges:

On or about April 11, 2015, in the District of South Dakota and elsewhere, Benjamin Lyle Iverson, defendant herein, knowingly, in and affecting interstate commerce, attempted to recruit, entice and obtain a person who had not attained the age of 18 years, and knew that the person would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, sections 1591 and 1594(a).

FORFEITURE ALLEGATION

1. The allegations contained in this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 1594(d)(1).
2. If convicted of an offense set forth above, Benjamin Lyle Iverson, the defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used to commit or to facilitate commercial sex trafficking. Such property includes, but is not limited to:

- a. Verizon LG cell phone, model VS415PP.
- b. \$116.00 United States currency.

A TRUE BILL:

**NAME REDACTED**

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Foreperson

RANDOLPH J. SEILER  
ACTING UNITED STATES ATTORNEY

By: 